REMARKS

In the Advisory Action dated February 11, 2003, the Examiner has requested that the Applicant describe the distinction between an object and a formal specification in the context of the invention. The undersigned earnestly believes that the distinction between an object of an object oriented environment and a specification used to generate a front-end component program is well known in the art. Furthermore, the specification provides an example of a specification language (i.e., JDWP specification language) (Specification, page 13-16).

Furthermore, it is respectfully submitted that the Examiner has the burden of asserting that the submitted material describes the claimed invention. Per the Examiner's request, this material was submitted. However, the Examiner has not made an assertion based on a reference to this material that this material teaches the claimed invention. Thus, the Examiner has merely asserted that there is public disclosure of the invention without making a prima facie case that at least asserts the claimed features are disclosed. Nevertheless, it is noted for the record that the material presented by the Applicant in the Java One (1998 and 1999) presentations discuss a Java Debugger Architecture. However, the disclosed material does not teach or suggest the claimed invention.

In the Final Office Action dated November 20, 2002, the Examiner rejected claims 1-18 under 35 U.S.C § 102(b) based upon public use or sale of the invention. Initially, it should be noted that the undersigned earnestly believes that the Examiner is attempting to reject claims 1-18 for public disclosure of the claimed invention. Moreover, the Examiner has merely asserted that there is public disclosure of the invention without making a prima facie case which at least asserts the claimed features are disclosed. Accordingly, it is respectfully submitted that this rejection is improper.

In any case, it is noted for the record that the material presented by the Applicant in the Java One (1998 and 1999) presentations discuss a Java Debugger Architecture. However, the disclosed material does not teach or suggest the claimed invention. As such, the presentation did not teach or suggest many of the recited features of the claimed invention. These features, for example, include inputting a formal specification into a code generator; parsing the formal specification; generating a front-end debugger

program portion from the formal specification; and generating a back-end debugger program portion from the formal specification such that the front-end is compatible with the debugger program. Accordingly, it is respectfully requested that the Examiner withdraw this rejection.

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In the Final Office Action, the Examiner has maintained the rejection of independent claims 1,12, 15 and 18 under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 5,787,245 (*You et al.*). In making this rejection, the Examiner has stated that an object can be considered to be a specification in the context of the relevant arts. (Final Office Action, page 4). It should be noted that there is a grave distinction between an object (an object of an object programming language) and a formal specification which can be put into a code generator. Thus, it is respectfully submitted that the Examiner, even in the broadest sense, cannot reasonably consider these to be the same.

Again, it should be noted that the "TpromitiveConnection" is <u>an object</u> which can handle communication between a client and a server. These connections allow the client to bind to a server, send a message to the server, and receive a message from the server. Similarly, the connection can be used by the server to communicate with the client (*You et al.*, Column 52, lines 5-20). As such, the "TpromitiveConnection" <u>object</u> cannot be considered a specification in the context of the relevant arts. Moreover, the "TprimitiveConnection" described in *You et al.* does not teach or suggest inputting a formal specification into a code generator. Instead, the "TprimitiveConnection" object relates to an abstract base class which defines a protocol for communication between a client and a server.

In fact, it is respectfully submitted that *You et al.* does not teach inputting a formal specification into a code generator which, in turn, parses the formal specification to generate a front-end debugger and a back-end debugger such that the front-end debugger and back-end debugger are compatible with each other. It is noted that *You et al.* pertains to a portable service for debugging computer software programs. It is also noted that the services provide a framework consisting of a debugger server and a debugger client. (*You et al.*, Abstract). However, it is earnestly believed that *You et al.* does not teach parsing a formal specification to generate a front-end debugger and a back-end debugger in the context of the invention.

Claim 1 pertains to a method for assuring compatibility between a formal specification, a front-end debugger program, and a back-end debugger program which interfaces with a debuggee system. As such, claim 1 recites inputting a formal specification into a code generator; parsing the formal specification; generating a front-end debugger program portion from the formal specification; and generating a back-end debugger program portion from the formal specification such that the front-end is compatible with the debugger program. Accordingly, it is respectfully submitted that claim 1 is patentable over *You et al.* for at least the reasons discussed above. In addition, claims that are dependent on claim 1 are also patentable for at least these reasons. Moreover, these claims recite additional features which render them patentable for additional reasons.

Claim 12 also pertains to a method for automatically generating front-end debugger interface code and back-end debugger agent interface code that are both compatible with a communication protocol. As such, claim 12 and its dependent claims are also patentable over *You et al.* for at least the reasons discussed above with respect to claim 1.

Although independent claims 15 and 18 respectively pertain to a computer readable medium and a computer system, these claims recite similar features as the features recited in claim 1. Accordingly, it is respectfully submitted that claims 15 and 18 and claims that are dependent on them are also patentable over *You et al.* for at least the reasons discussed above with respect to claim 1.

Based on the foregoing, it is submitted that claims 1-11, 23-28 and 32-34 are patentably distinct over the cited art of record. Additional limitations recited in the independent claims or the dependent claims are not further discussed as the above-discussed limitations are clearly sufficient to distinguish the claimed invention from the cited art. Accordingly, it is respectfully requested that the Examiner withdraw all the rejections.

Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner

is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 500388 (Order No. SUN1P252).

Respectfully submitted, BEYER WEAVER & THOMAS, LLP

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